## RICHARD H. ROSENBERG ATTORNEY AT LAW

217 Broadway Suite 707 New York, New York 10007 TEL: 212-586-3838 FAX: 212-962-5037 richrosenberg@msn.com

January 4, 2022

Hon. Katherine Polk Failla United States District Court U.S. Courthouse 40 Foley Square New York, New York 10007



Re: United States v. Drilon Haxhaj 21 Cr. 17 (KPF)

Dear Judge Failla:

I am the assigned CJA counsel for defendant Drilon Haxhaj. I write today to respectfully request authorization for the expenditure of CJA funds to retain the services of Clara S. Kalhous, Esq. as associate counsel to assist me in defending Mr. Haxhaj. Ms. Kalhous has assisted several S.D.N.Y. counsels, including me, in the past as an associate counsel and, in fact, ably assisted me before Your Honor in the case of <u>United States v. Martin Mateo</u>, 17 Cr. 449 (KPF). Just this past October Ms. Kalhous served as associate counsel to me in a trial before Judge Preska (<u>United States v. Adelekan</u>, 19 Cr. 291 (LAP)) and her assistance was first rate. Ms. Kalhous is experienced and adept at reviewing digital discovery, preparing legal memoranda and preparing for and assisting at trial should one occur. She would be an invaluable addition to Mr. Haxhaj's defense

As Your Honor is aware, the discovery in this case is quite voluminous. Accordingly, should Your Honor be inclined to grant this application it is respectfully requested that Ms. Kalhous be approved at the rate of \$110.00 per hour for an initial period of 75 hours with leave to request additional funding should the need arise. Of course, every effort will be made to avoid duplication of the work load.

Thank you for your consideration to this request and continued courtesies to counsel.

Respectfully submitted,

Richard H. Rosenberg

cc.: Clara Kalhous, Esq.

Application GRANTED. Ms. Kalhous is directed to file a notice of appearance promptly. The Clerk of Court is directed to terminate the pending motion at docket number 80.

Dated: January 4, 2022

New York, New York

SO ORDERED.

HON. KATHERINE POLK FAILLA UNITED STATES DISTRICT JUDGE

Katherin Palle Fails